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PLEASE REPLY TO THE MISSOURI OFFICE

VIA FEDERAL EXPRESS

June 11, 1997

Mr. Jose M. Rodriguez
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Re: Southern Education Counsel, Inc.; MUR 3774

Dear Mr. Rodriguez:

In response to your correspondence of May 12, 1997, I am providing the following information. This information relates to calling which was conducted by Southern Education Counsel, Inc. during 1994. After an exhaustive search, my client has been able to uncover some information believed to be related to subcontracted calling done for, and with, relation to the 1994 Minnesota Senate race.

The specific entity which conducted the subcontracted activity would have been the Southern Education Counsel, Inc. The other companies/corporations listed in your correspondence are not engaged in any professional fund-raising activities. The Southern Education Counsel, Inc. is a related entity to Civic Development Group, Inc. As I previously mentioned, the Southern Education Counsel, Inc. is normally engaged in professional fund-raising activities. Such activities normally involve directly contacting consumers over the telephone and seeking financial support for charitable and other nonprofit organizations.

Southern Education Counsel, Inc. acted as a subcontractor of Optima Direct, Inc. Optima Direct, Inc. is a professional fund-raising/ direct marketing firm located at 8100 Boone Blvd., Suite 300, Vienna, VA 22182. Optima Direct is also normally engaged in the same or similar types of professional fund-raising activities as Southern Education Counsel, Inc. Either Scott Pasch or David Keezer, principals of Civic Development Group, were the ones involved in entering into the subcontract. The only other persons involved would have been individual telemarketers who simply contacted consumers either on a commission or paid-hourly basis.

There are no additional records or documents pertaining to this activity other than computer records of payments received for subcontracted work conducted by Southern Education Counsel, Inc. and/or Civic Development Group. Any work done under subcontract was simply invoiced to

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JUN 12 1997

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Optima Direct and payments were then made directly from Optima to Civic Development. The enclosed invoices reflect the extent of the financial involvement of Southern Education Counsel, Inc.

I hope this information is helpful in the course of your investigation. Should you need anything further, please contact me. I thank you for your courtesies in this matter.

Very truly yours,



Greg B. Lam
For the Firm

GBL:d
Enclosures

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FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE
COMMUNICATIONS SECTION

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CIVIC DEVELOPMENT GROUP									
INVOICE#: NL181-001									
COMPILED BY BRIAN PASCH 11/8/94									
PLEASE FOWARD TO: SHANNON MACNUTT									
CAMPAIGN: NL181	16	6	99	17	TOTALS	RATE	CHARGE		
RESPONSE CODE RESULTS									
11 - Good Contact (1)	24911	14587	25016	3487	68001	0.4	\$27,200		
12 - Good Contact - Ans Mach (2)	1919	1445	1824	267	5455	0.4	\$2,182		
40 - Early Hangup - Refusal (3)	2038	1839	3972	403	8252	0.4	\$3,301		
43 - Do Not Call (4)	58	98	90	5	251	0.4	\$100		
TOTAL CONTACTS					81,959		32,783.64		
50 - Disconnected/Bad Number (5)	1521	808	1052	104	3485	0	\$0		
52 - Deceased (6)	44	25	16	3	88	0	\$0		
No Adult at Home	862	157	86	76	1105	0	\$0		
Dialer Detect Bad Number/Misc	1215	1064	1417	181	3696	0	\$0		
TOTAL COMPLETES	32568	20023	33473	4526	90590				
TOTAL RECORDS	32,568	25,000	40,739	8,432	106739				
CUMULATIVE FILE PENETRATION	100	80,092	82,16	53,68	84,87057				
60 - Unused records	0	4,977	7,266	3,906	16,149				
TOTAL INVOICE CHARGES:							\$32,784		

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CIVIC DEVELOPMENT GROUP									
INVOICE#: NL182-001									
COMPILED BY BRIAN PASCH 11/8/94									
PLEASE FOWARD TO: SHANNON MACNUTT									
NL182	16	6	17	5	7	TOTALS	RATE	CHARGE	
RESPONSE CODE RESULTS									
11 - Good Contact (1)	19677	11560	21274	16726	13945	83182	0.4	\$33,273	
12 - Good Contact - Ans Mach (2)	2532	919	1761	647	591	6450	0.4	\$2,580	
40 - Early Hangup - Refusal (3)	1250	1108	2000	327	2494	7179	0.4	\$2,872	
43 - Do Not Call (4)	26	34	66	15	26	167	0.4	\$67	
TOTAL CONTACTS						96,776		\$38,791	
50 - Disconnected/Bad Number (5)									
52 - Deceased (6)	3233	1190	1730	1193	1928	9274	0	\$0	
No Adult at Home	26	33	13	3	4	79	0	\$0	
Dialer Detect Bad Number/Misc	440	12	49	11	21	501	0	\$0	
	3159	1607	3098	1919	1942	7864	0	\$0	
TOTAL COMPLETES	30343	16463	29991	20841	20951	118589			
TOTAL RECORDS									
	40,000	20,000	40,000	23,989	25,000	148989			
CUMULATIVE FILE PENETRATION	75,8575	82,315	74,98	86,88	83,80	79,59581			
60 - Unused records	9,657	3,537	10,009	3,148	4,049	30,400			
TOTAL INVOICE CHARGES:									\$38,791

CIVIC DEVELOPMENT GROUP, INC.
655 Florida Grove Road
Suite 203, Second Floor
Hopelawn, NJ 08861

INVOICE

Phone #: 908-634-1411
Fax #: 908-634-6106

INVOICE NO: 95-001
DATE: January 18, 1995

To:

Optima Direct
Attn: Accounts Payable

SALESPERSON	P.O. NUMBER	DATE SHIPPED	SHIPPED VIA	F.O.B. POINT	TERMS

QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
63,245	Campaign NL201A, Campaign NL201B	\$ 0.40	\$25,298.00
83,907	Campaign G0410, CampaignG0410-II	\$ 0.40	\$33,562.80
22,249	Campaign CM530	\$ 0.45	\$10,012.05
137,513	Campaign MH211, Campaign MH212	\$ 0.40	\$55,005.20
75,403	Campaign MH213	\$ 0.40	\$30,161.20
151,381	Campaign NL180, Campaign NL181	\$ 0.40	\$60,552.40
96,978	Campaign NL182	\$ 0.40	\$38,791.20
SUBTOTAL			\$253,382.85
Less Amount paid			\$243,372.00
TOTAL DUE			\$10,010.85

Make all checks payable to: Civic Development Group, Inc.
If you have any questions concerning this invoice, call: Treisa Flanagan, (908) 634-1411

THANK YOU FOR YOUR BUSINESS!